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Attorneys for Debtor, Tulare Local Healthcare District,  
dba Tulare Regional Medical Center

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897  
Address: 869 N. Cherry St.  
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-35

Date: May 17, 2018  
Time: 9:30 a.m.  
Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13  
Judge: Honorable René Lastreto II

EXHIBITS IN SUPPORT OF MOTION FOR ORDER APPROVING AGREEMENT  
RELATING TO RELIEF FROM THE AUTOMATIC STAY (MEC)

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EXHIBITS IN SUPPORT OF MOTION FOR ORDER  
APPROVING AGREEMENT RELATING TO RELIEF FROM  
STAY (MEC)

Exhibit	Description	Pages
A	Stipulation for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 that will be presented to the superior court once signed	3
B	[Proposed] Order Approving Agreement Relating to Relief from the Automatic Stay	2

Dated: May 3, 2018

WALTER WILHELM LAW GROUP,  
a Professional Corporation

By: Riley C. Walter  
Riley C. Walter,  
Attorneys for Debtor, Tulare Local  
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Medical Center

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Fresno, CA 93721  
Courtroom 13  
Dept. B, Fifth Floor  
Judge: Honorable René Lastreto II

STIPULATION FOR RELIEF FROM THE AUTOMATIC STAY  
PURSUANT TO 11 U.S.C. § 362

TULARE LOCAL HEALTHCARE DISTRICT, dba Tulare Regional Medical Center  
("TRMC") and TULARE REGIONAL MEDICAL CENTER MEDICAL STAFF ("Plaintiff  
Medical Staff"), by and through their respective counsel, hereby enter into the within  
Stipulation for Relief from the Automatic Stay pursuant to 11 U.S.C. § 362 (the  
"Stipulation"). The Stipulation is made with reference to the following:

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**STIPULATION AND AGREEMENT**

NOW, THEREFORE, subject to Court approval, the parties hereby stipulate and agree as follows:

1. The Automatic Stay pursuant to 11 U.S.C. § 362 shall be modified to allow the Lawsuit to continue for the sole purpose of entering a final judgment and order for equitable and other relief.

2. Any amendment to this Stipulation shall be made in writing, signed by TRMC and Plaintiff Medical Staff, and approved by the Court.

3. TRMC and Plaintiff Medical Staff stipulate to entry of an order approving this Stipulation subject to compliance with FRBP 4001, if required.

IT IS HEREBY STIPULATED AND AGREED.

May\_\_\_\_, 2018

LAW OFFICES OF JOHN D. HARWELL

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John D. Harwell, Attorneys for Plaintiff,  
Tulare Regional Medical Center Medical  
Staff

May\_\_\_\_, 2018

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Riley C. Walter, Attorneys for Debtor,  
Tulare Local Healthcare District, dba  
Tulare Regional Medical Center

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EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

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Judge: Honorable René Lastreto II

ORDER APPROVING AGREEMENT RELATING TO RELIEF FROM THE  
AUTOMATIC STAY

At Fresno, in the Eastern District of California.

The Court having received and reviewed the Motion for Approval of Agreement  
Relating to Relief From the Automatic Stay, the Motion having been duly and properly  
served and noticed, and there being no objection to the relief sought, and good cause  
appearing,

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IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Motion be approved and said Stipulation attached to this Order as Exhibit "A" shall be, and hereby is, adopted as the Order of this Court.

Presented by:

WALTER WILHELM LAW GROUP  
a Professional Corporation

Riley C. Walter,  
Attorneys for Debtor, Tulare Local  
Healthcare District, dba Tulare Regional  
Medical Center

IT IS SO ORDERED.

Dated: May \_\_\_\_, 2018

United States Bankruptcy Judge